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SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

2015 AUG 19 PM 1:46

UNITED STATES OF AMERICA,

Plaintiff,

v.

██████████,
ROBERTO CRUZ-GARCIA (2),
PRISCILLA MARTINEZ (3),
██████████,
██████████,
██████████

JEREMY ALVARADO (6),

Defendants.

I N D I C T M E N T

[Vio: 21 USC §§ 846,
841(a)(1) & (B)(1)(B):
Conspiracy to Distribute
a Controlled Substance;
21 USC §§ 841(a)(1) &
(B)(1)(B): Possession
with Intent to
Distribute a Controlled
Substance; 18 USC § 2:
Aiding & Abetting

THE GRAND JURY CHARGES:

SA 15 CR 0579 XR

COUNT ONE

[21 USC § 846 to violate §§ 841(a)(1) & 841(b)(1)(B)]

That beginning on or about December 1, 2014, the exact date unknown, and continuing until on or about August 19, 2015, in the Western District of Texas and elsewhere within the jurisdiction of the Court, Defendants,

██████████,
ROBERTO CRUZ-GARCIA (2),
PRISCILLA MARTINEZ (3),
██████████,
██████████,
██████████

JEREMY ALVARADO (6),

unlawfully, knowingly, and intentionally combined, conspired, confederated and agreed together and with others to distribute a

controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and in violation of Title 21, United States Code, Section 846.

QUANTITY OF CONTROLLED SUBSTANCE INVOLVED IN THE CONSPIRACY

The quantity of the mixture or substance containing a controlled substance involved in the conspiracy and attributable to each Defendant as a result of each Defendant's own conduct and as a result of the conduct of other conspirators reasonably foreseeable to each Defendant is as follows:

DEFENDANT	QUANTITY
[REDACTED]	[REDACTED]
ROBERTO CRUZ-GARCIA (2)	1,000 grams or more of a mixture or substance containing a detectable amount of heroin
PRISCILLA MARTINEZ (3)	100 grams or more of a mixture or substance containing a detectable amount of heroin
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
JEREMY ALVARADO (6)	1,000 grams or more of a mixture or substance containing a detectable amount of heroin

COUNT TWO

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC § 2]

That on or about April 8, 2015, in the Western District of Texas, Defendants,

[REDACTED]
ROBERTO CRUZ-GARCIA (2),
PRISCILLA MARTINEZ (3),

aided and abetted by each other and others, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT THREE

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC § 2]

That on or about April 10, 2015, in the Western District of Texas, Defendants,

[REDACTED]
ROBERTO CRUZ-GARCIA (2),

aided and abetted by each other and others, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title

21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FOUR

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC § 2]

That on or about May 5, 2015, in the Western District of Texas, Defendants,

[REDACTED]
ROBERTO CRUZ-GARCIA (2), and
[REDACTED]

aided and abetted by each other and others, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT FIVE

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC § 2]

That on or about May 6, 2015, in the Western District of Texas, Defendants,

[REDACTED]
PRISCILLA MARTINEZ (3),
[REDACTED]
JEREMY ALVARADO (6),


aided and abetted by each other and others, unlawfully, knowingly, and intentionally possessed with intent to distribute

a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and Title 18, United States Code, Section 2.

COUNT SIX

[21 USC §§ 841(a)(1) & 841(b)(1)(B) and 18 USC § 2]

That on or about June 12, 2015, in the Western District of Texas, Defendants,

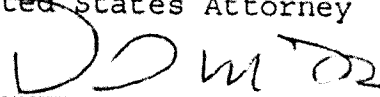

JEREMY ALVARADO (6),

aided and abetted by each other and others, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance, which offense involved 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, in violation of Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(B), and Title 18, United States Code, Section 2.

A TRUE BILL,


FOREPERSON

RICHARD L. DURBIN, Jr.
United States Attorney


DAVID M. SHEARER
Assistant United States Attorney